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WELLS FARGO BANK, N.A. AS  
TRUSTEE FOR PARK PLACE  
SECURITIES, INC. ASSET-BACKED  
PASS-THROUGH CERTIFICATES, SERIES  
2005-WCW2,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,  
INC., et al.,

Defendants.

Case No.: 2:20-cv-02156-APG-NJK

**STIPULATION AND PROPOSED  
ORDER EXTENDING DEFENDANT  
FIDELITY NATIONAL TITLE  
INSURANCE COMPANY'S TIME TO  
RESPOND TO MOTION FOR  
REMAND [ECF No. 11] AND MOTION  
FOR FEES AND COSTS [ECF No. 12]**

**(Second Request)**

Defendant Fidelity National Title Insurance Company (“Fidelity”) and plaintiff Wells Fargo Bank N.A. (“Wells Fargo”) hereby agree and stipulate as follows:

1. On November 23, 2020, Wells Fargo filed its Complaint in the Eighth Judicial District Court, Case No. A-20-825267-C;

2. On November 23, 2020, Fidelity removed the action to this Court;

3. On December 18, 2020, Wells Fargo filed a motion to remand and a motion for fees and costs (ECF Nos. 11 and 12) (the “Motions”);

4. Fidelity’s current deadline to respond to the Motions is February 3, 2021;

5. Wells Fargo’s Motions are based upon the forum defendant rule, 28 U.S.C. § 1441;

6. The parties have mutually agreed to extend Fidelity’s deadline to respond to Wells Fargo’s Motions by seven (7) days, to allow Fidelity to further evaluate whether the dissolution of defendant Land Title of Nevada, Inc. impacts the Motions and its arguments regarding the same;

7. Wells Fargo does not oppose the extension;

8. This is the second request for an extension which is made in good faith and not for purposes of delay;

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1           **IT IS SO STIPULATED** that Fidelity's deadline to respond to Wells Fargo's motion to  
2 remand and the motion for fees and costs (ECF Nos. 11 and 12) is hereby extended through and  
3 including Wednesday, February 10, 2021.

4  
5 Dated: February 2, 2021

EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP

6  
7 By: /s/-- Sophia S. Lau  
SCOTT E. GIZER  
SOPHIA S. LAU  
Attorneys for Defendant FIDELITY  
8 NATIONAL TITLE INSURANCE  
9 COMPANY

10  
11 Dated: February 2, 2021

SINCLAIR BRAUN LLP

12 By: /s/-Kevin S. Sinclair  
KEVIN S. SINCLAIR  
Attorneys for Defendant FIDELITY  
13 NATIONAL TITLE INSURANCE  
14 COMPANY

15 Dated: February 2, 2021

WRIGHT FINLAY & ZAK, LLP

16 By: /s/-Darren T. Brenner  
DARREN T. BRENNER  
Attorneys for Plaintiff WELLS FARGO  
17 BANK, N.A.  
18

19 **IT IS SO ORDERED:**

20  
21 Dated: February 2, 2021

22 By:   
UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on February 2, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ Valerie Segura

VALERIE SEGURA

An Employee of EARLY SULLIVAN

WRIGHT GIZER & McRAE LLP

